

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
	:
MHS CAPITAL LLC, and EAST COAST MINER	:
LLC,	:
	No.: 1:16-cv-01794-VM
	:
Plaintiffs,	:
	:
- against -	:
	:
KEITH GOGGIN, MICHAEL GOODWIN, and	:
JOHN COLLINS	:
	:
Defendants.	:
	:
	:
	:
-----X	

Plaintiffs MHS Capital LLC (“MHS”) and East Coast Miner LLC (“ECM”), by and through their attorneys Arkin Solbakken LLP, pursuant to Federal Rule of Bankruptcy Procedure 9027, state:

1. Plaintiffs deny the allegation in the notice of removal that upon removal the proceeding is core. (Docket No. 1, ¶ 20.)
2. Plaintiffs respectfully do not consent to entry of final orders or judgment by a bankruptcy judge.
3. As set forth in Plaintiffs’ letters to the Court, dated March 18 and 23, 2016, which are respectfully incorporated herein, Plaintiffs’ intend to timely move to remand this action to state court.

Dated: New York, New York
March 23, 2016

Respectfully submitted,

ARKIN SOLBAKKEN LLP

By: /s/ Stanley S. Arkin, Esq.
Stanley S. Arkin, Esq.
(SDNY # SA-1373)
SArkin@arkin-law.com
750 Lexington Avenue
New York, New York 10022
(212) 333-0200 (telephone)
(212) 333-2350 (facsimile)

Attorneys for Plaintiffs